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1 build-out of the Warren lab facility. As time  
2 consuming as this is, Carmelo has continued to provide  
3 great service to his many clients in CTI global  
4 engineering."

5 Do you agree with that paragraph?

6 A. From the standpoint of supporting the  
7 equipment that I was -- essentially, this -- the  
8 context this all should be taken in, right, is  
9 essentially my support of the lab facility, right.

10 If there is no lab facility, I have no job,  
11 right. So essentially everything that was done here,  
12 right, was centric to me keeping my job, right.

13 I have a family to support. I have a  
14 daughter, right.

15 Q. Is there anything that is misleading about  
16 that paragraph?

17 A. Depending on what spin you decide to put on  
18 it, it could be misleading, yeah. I think it's in the  
19 context of really me providing support, right, really,  
20 because I maintained relationships with representatives  
21 of eight different engineering disciplines whose  
22 requirements contradict each other.

23 Essentially, what ended up happening in the  
24 lab is, you had all these different groups that were

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1 paying for different cabinets or different areas within  
2 the lab, right.

3 Based on that, they would divvy up space,  
4 they managed their space, they told me whether I can  
5 use their space to install the equipment or not. And  
6 essentially, I was just going back and forth, right,  
7 with them figuring out where equipment needed to be  
8 installed, right.

9 **Q. Did you assume responsibility for the**  
10 **build-out of the Warren lab facility?**

11 A. Not completely.

12 I mean, it was done -- for the aspects that  
13 pertain to me as far as my job function was concerned,  
14 right, and being able to move the existing lab facility  
15 from 388 Greenwich to Warren, the equipment that I  
16 supported, yeah, I took responsibility for that aspect  
17 of it, yeah.

18 **Q. You never told Paul Holder that you disagreed**  
19 **with that portion of your performance review?**

20 MS. WALSH: Objection to the form.

21 THE WITNESS: Maybe I should  
22 elaborate on exactly what was taking place,  
23 right.

24 We had a couple of hundred computers in

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1 the 388 Greenwich facility that I supported,  
2 right. Those computers needed to move from 388  
3 Greenwich to the Warren lab facility, right.

4 In order for them to move to the Warren  
5 lab facility, right, they needed input as far as  
6 what type of cabling would be necessary, what  
7 type of facilities would be necessary, the amount  
8 of cabinets that were necessary, based on our  
9 existing setup, right.

10 So I assisted in collecting information,  
11 right, and provided this information to the  
12 appropriate people.

13 There were teams of people working on  
14 these projects, right. There was various labs.  
15 If I'm not mistaken, they were building out 18  
16 labs within the Warren facility, right.

17 So the equipment that I supported needed  
18 to get to Warren, right. Global engineering,  
19 right, wasn't -- the project for whatever reason,  
20 was really -- I didn't have enough experience at  
21 the time, right, to determine exactly what was  
22 going on.

23 I was taking direction from Paul, Amedeo,  
24 Yesim Akdeniz, as far as what I needed to be

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1 doing.

2 So I was doing my support  
3 responsibilities. And then on top of it they  
4 were like, look, we need to move the lab to  
5 Warren, right. So, you know, help us, you know,  
6 gauge what needs to happen to make that occur,  
7 right.

8 It wasn't my primary job responsibility,  
9 I wouldn't say, right, because my primary job  
10 responsibilities and my reviews were based on the  
11 lab being up and functioning.

12 If I walked in on any given date and the  
13 lab was down, right, from a connectivity -- a  
14 network connectivity standpoint, or the requests  
15 that were taking place in the lab weren't being  
16 processed and equipment wasn't getting installed,  
17 right, that was my primary evaluation.

18 That's what I was primarily held to in  
19 addition to all these other, like, information  
20 gathering exercises that I performed, right, and  
21 helping them gauge what they needed within the  
22 facility at Warren, right. That's what this is  
23 relevant to.

24 So essentially we had a lab in 388

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1 Greenwich. The lab needed to move to Warren. I  
2 supported the lab, right. The lab wasn't going  
3 to move if I didn't help them do it, right. And  
4 they asked me to assist them in it.

5 BY MS. BOUCHARD:

6 Q. Did Naseer have the same responsibilities  
7 with respect to the build-out of the Warren lab  
8 facility?

9 A. He helped in the information gathering  
10 process. He helped to stage the equipment prepare  
11 sheets, gather information, yeah.

12 Q. At some point did you have a dispute with  
13 Naseer?

14 A. Yeah. I don't think it's relevant to this,  
15 but, I mean, what would you like to know about it?

16 Q. What was your dispute with Naseer?

17 A. Essentially, me and Naseer were coworkers.  
18 And Naseer tended to go on vacation, takes days off,  
19 and do other things that would affect my workload  
20 within the lab.

21 So being that there was only two technicians  
22 within the lab that were supporting lab requests and  
23 supporting the lab in general --

24 Q. You and Naseer?

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1 A. Me and Naseer, right.

2 If he failed to -- if he installed something  
3 and he failed to document it properly, right, and then  
4 there was an issue with that machine and I went to  
5 troubleshoot that issue, I would essentially need to do  
6 all of the work he did all over again, right.

7 I would basically need to perform the entire  
8 installation again and document it properly, so on and  
9 so forth, in addition to the already excessive workload  
10 that I had.

11 So I used to try to approach him on a  
12 personal basis just to avoid, you know, like the whole  
13 back and forth.

14 I don't want to seem like a child constantly  
15 going to our managers and explaining to them that, you  
16 know, this guy is grossly inadequate for the job he's  
17 performing, right. Because, really, I mean, why would  
18 I even put him up there in that fashion.

19 So as a professional courtesy, right, I would  
20 approach him about the things that he was failing to do  
21 that were affecting me, right, which were part of his  
22 job responsibilities as far as supporting the lab.

23 So he never really took to that very well.  
24 He was always in denial about it, right, and he was

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1 constantly causing me problems.

2 And, I mean, these are the conversations I  
3 had with Paul and Amedeo about it. And it got to the  
4 point where really I wouldn't even deal with him. I  
5 would just go speak to Paul about the things that were  
6 happening, right, and I would just highlight the errors  
7 that he made and I wouldn't even fix them, right.

8 Because it was -- I guess since they weren't  
9 in the lab performing the day-to-day activities, they  
10 weren't fully aware of like what was going on and the  
11 types of issues that were occurring, right, between us.

12 **Q. So was Naseer not taking your efforts to**  
13 **mentor him very seriously?**

14 MS. WALSH: Objection to the form  
15 of the question. Mischaracterization of his  
16 testimony.

17 THE WITNESS: No, he was not -- he  
18 was not cooperating. He wasn't being a good  
19 coworker, right.

20 Naseer explicitly told me that I was not  
21 his manager, right. And he was taking it from  
22 the point where I was trying to manage him, and I  
23 wasn't trying to manage him, right.

24 Essentially, what was occurring -- his

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1 perception of what was happening, right, and what  
2 was really occurring -- first of all, I didn't  
3 hire him. I didn't interview him. If I could  
4 have fired him, I would have, right.

5 And as far as the whole situation where  
6 Paul was concerned, I was like, you know what?  
7 Not for nothing, but really you should get rid of  
8 the guy.

9 And that was my personal opinion, right,  
10 as an employee speaking to our manager, right,  
11 the person who does have the capacity to hire,  
12 fire, discipline, so on and so forth, right.

13 BY MS. BOUCHARD:

14 **Q. But they -- I'm sorry. Continue.**

15 A. But Naseer, right, my problem with Naseer was  
16 that the work efforts that we cooperatively were  
17 supposed to be working towards, right, weren't  
18 completed cleanly on his behalf.

19 He wasn't -- he didn't take his work  
20 seriously, right. I don't know if it was due to lack  
21 of knowledge or whatever the case may be.

22 Really, most of it was typos. Like data  
23 entry typos, failures to follow, like, you know,  
24 industry best practices, company best practices, so on



1 and so forth, right.

2 And these things would affect me and cause  
3 me, right, if I was troubleshooting -- he was so  
4 notoriously sloppy that he would install a computer and  
5 then, you know, and then put it on the wall, plug it  
6 into the wrong networks, right, and now we're  
7 responsible for network connectivity.

8 When these people bring up this device and it  
9 doesn't function as it's supposed to, right, from a  
10 network perspective, they put in a trouble ticket for  
11 support. Then I have to deal with it.

12 So now I'm realizing that everything Naseer  
13 did was in vain or he ran them in the wrong direction,  
14 and I would have to repeat his work efforts over in  
15 addition to the stuff I was processing.

16 So from a network support perspective, the  
17 guy was severely lacking, right. And that was the  
18 nature of my issue with him his entire time there.

19 **Q. Now, you said that Amedeo and Paul didn't see**  
20 **it because they were sitting somewhere else.**

21 **Where were they located?**

22 **A.** Well, actually, Naseer, Amedeo and Paul --  
23 Paul was -- when we moved to Warren, Paul was not -- he  
24 lived in New York. He wasn't moving to Warren. So he

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1 actually ended up transferring. But then even before  
2 the transfer, he was sitting here in New York.

3 Amedeo sat upstairs on the fourth floor. The  
4 lab facility was on the first floor. Naseer sat  
5 upstairs on the fourth floor.

6 But they didn't see it due to physical  
7 proximity, they didn't see it just because they were  
8 not performing the work, right, they weren't performing  
9 the support work.

10 So they weren't aware of what the nature of  
11 the issue was, right.

12 **Q. You said that Amedeo was on the fourth floor?**

13 **A. Correct.**

14 **Q. You were on the first floor?**

15 **A. Correct.**

16 **Q. Did you have a set desk or cube?**

17 **A. We had cubes on the fourth floor. And then**  
18 **there was a lab facility where we performed the**  
19 **majority of our work and really was where we should be.**

20 Throughout our career there, there was like  
21 an ongoing question as to whether we should even have  
22 cubicles, right.

23 When we were at 388 Greenwich, they were  
24 trying to get rid of our cubicles because the vast

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1 majority of our time was spent in the lab supporting  
2 it.

3 Q. Did you have a computer?

4 A. Yes.

5 Q. E-mail?

6 A. Yeah.

7 Q. Phone?

8 A. Yes.

9 Q. I understand that you have some Cisco  
10 certifications?

11 A. They're not currently active.

12 I had a Cisco and CCNA.

13 Q. What's involved with a CCNA?

14 A. A Cisco CCNA is essentially a general  
15 networking certification for Cisco equipment. They  
16 familiarize you with Cisco IOS, which is the operating  
17 system for Cisco equipment, right.

18 And basically, they give you like an overall  
19 understanding of network technologies as they relate to  
20 Cisco equipment.

21 Q. Did you have that since 2001?

22 A. Yeah. I got it my first year, if I'm not  
23 mistaken, when I was with Citigroup.

24 It was a self -- essentially, it was a self

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1 -- I took the curriculum by myself, right, and I went  
2 and I took the test outside of Citigroup.

3 Citigroup wasn't involved in my Cisco  
4 certification efforts.

5 (Whereupon, a discussion was held  
6 off the record.)

7 (Whereupon, Exhibit Millan-4 was  
8 marked for identification.)

9 BY MS. BOUCHARD:

10 Q. Mr. Millan, what's been placed before you as  
11 Exhibit 4, this is something that we got off the  
12 Internet from Cisco.

13 I just want you to review this to see if  
14 these are the types of classes that you took for your  
15 CCNA.

16 MS. WALSH: Do you want him to read  
17 through the whole thing?

18 I'm just going to object to this being  
19 shown to him as an exhibit.

20 There's no foundation with respect to  
21 whether he's seen this document before or whether  
22 it's anything that was provided to him at  
23 Citigroup, and I'm not sure of the relevance of  
24 the question.

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1 If you want to ask him if he did specific  
2 things from this document, I think that might be  
3 a better way of doing this.

4 I think it might be misleading to show  
5 him a lengthy document and ask him if he did the  
6 things that are contained in it.

7 MS. BOUCHARD: Well, he did say  
8 that he got his CCNA certification.

9 This document goes through the CCNA exams  
10 and recommended training.

11 And I'm just wondering if this is the  
12 type of training he took and the courses he took  
13 to get his certification.

14 MS. WALSH: Okay. I'm just going  
15 to reiterate my objection to the extent that he  
16 testified that he took it in 2001. This document  
17 was printed in 2008.

18 And again, I think it might be more  
19 appropriate if you asked him specifically if he  
20 did certain types of classes or what the classes  
21 consisted of.

22 I'm going to continue to object to the  
23 use of this as an exhibit.

24 MS. BOUCHARD: Okay. I understand

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1 your objection.

2 BY MS. BOUCHARD:

3 Q. Could you just review the document and let me  
4 know if these are the types of classes that you took in  
5 2001 or 2000, before you got your certification?

6 MS. WALSH: An ongoing objection to  
7 this line of questioning.

8 (Witness reviewing document.)

9 THE WITNESS: It would appear the  
10 curriculum has changed since I studied for the  
11 test.

12 And, no, I didn't take any courses. I  
13 actually read a self-prep book and took the CCNA  
14 exam based on that.

15 BY MS. BOUCHARD:

16 Q. But at that time that allowed you to get the  
17 certification?

18 A. Correct.

19 Q. Then I understand that you were taking  
20 courses for the CCNP?

21 A. Yes, I was.

22 Q. Did you take all the courses for that?

23 A. No.

24 Actually, when I transferred, when I was

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1 given the lateral move from the network integration  
2 group to the global engineering group, Yesim Akdeniz  
3 cancelled my training apparently because she didn't  
4 think it was fair that it -- I didn't quite understand,  
5 right, because CTI as a whole, paid for the training  
6 within the company, right.

7 And somehow she ended up cancelling my  
8 training because she didn't think it was fair to the  
9 rest of the engineering staff, and, I mean, probably  
10 went and said that she probably didn't think it was  
11 relevant to my job responsibilities, right.

12 **Q. Did she say that, or --**

13 A. No. I mean, she didn't say anything to me  
14 directly.

15 She had told Paul that essentially, you know,  
16 Carmelo can't receive this training because -- whatever  
17 reason.

18 She didn't really specifically specify. She  
19 said that it -- she didn't think it was fair to the  
20 rest of the engineering staff and thought that it might  
21 affect their budgeting.

22 **Q. But she didn't give any other reason that you**  
23 **know of?**

24 A. They didn't give any clear reason, no.

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1 Q. What were the unforeseen circumstances for  
2 your resignation?

3 MS. WALSH: Objection to the form.

4 THE WITNESS: Unforeseen  
5 circumstances to my resignation?

6 The fact that I was promised one job,  
7 right. And what I was actually doing was a  
8 totally different job, right.

9 I was promised a steppingstone into  
10 engineering. And really what I ended up being,  
11 right, was a data center tech. It was just  
12 facilitating, you know, server installs.

13 Just the utter volume of it, right, meant  
14 that that was what I was going to be spending the  
15 majority of my time doing.

16 And there was no way out of it without  
17 them staffing the lab properly. And it really  
18 wasn't in Yesim -- again, due to the budgeting  
19 issues and the separate budget -- budgets within  
20 global engineering, it really wasn't in  
21 Yesim Akdeniz' best interest to turn around and  
22 hire a support staff for the lab.

23 Because then it would mean that she would  
24 be taking a monetary hit in the form of four



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1 additional full-time employees, right, to support  
2 the lab for all of global engineering, right.

3 Essentially, the budget should have been  
4 under global engineering and it should have been  
5 a separate, you know, lab support department,  
6 right.

7 But being that they had no better place  
8 to put it, they put us in the network engineering  
9 because it was the central component to the  
10 various engineering groups, right.

11 Everybody needed to get on the network in  
12 order to do their work and perform their  
13 certification efforts, right, so they put us with  
14 a network.

15 Yesim did not want to pay, right, to hire  
16 a lab support team. She didn't even want to  
17 categorize it as a lab support team.

18 The reason I was called a network  
19 engineer, right, and not a support technician,  
20 was because they put me within network  
21 engineering because CTI as a whole -- I mean,  
22 this goes back to the whole reason that they  
23 created the position in the first place, right,  
24 and the whole reason I went from network

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1 integration, right, to network engineering and my  
2 title was changed, right.

3 So I left because they had hired two  
4 consultants, and those two consultants were  
5 supposedly supposed to be here six months and  
6 then be hired on full time.

7 That would give us four people within the  
8 lab, right, and really would give the opportunity  
9 for the original job function that was  
10 envisioned, right, as a steppingstone into  
11 network engineering to take place.

12 At the end of their six-month contract,  
13 right, they turned around and they let these guys  
14 go.

15 Now, I'm stuck back with Naseer, this guy  
16 who doesn't even work with me properly, who  
17 doesn't even want to do the job he's doing,  
18 right, who doesn't even like me, right. So why  
19 am I going to be there?

20 I mean, I left on my birthday, really.

21 BY MS. BOUCHARD:

22 **Q. Did human resources need to get involved with**  
23 **your dispute with Naseer?**

24 **A. Naseer would run behind my back. I mean, I**

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1 was shown -- well, I was read statements from --

2 MS. WALSH: I'm just going to  
3 caution you not to disclose anything that reveals  
4 any attorney-client privileges.

5 THE WITNESS: That's fine.

6 Naseer apparently -- no, I was never  
7 aware of it, right, because I never went to HR,  
8 right. And HR never, like, approached me.

9 The conversations I had were essentially  
10 with Paul and Amedeo. And they didn't  
11 necessarily disclose to me that HR was involved.

12 Like they might have mentioned it once,  
13 but they didn't delve into what the situation  
14 was.

15 BY MS. BOUCHARD:

16 Q. What statements are you referring to?

17 A. What was that?

18 Q. You said that you read a statement.

19 A. No, no. I didn't say I read a statement.

20 Q. You did.

21 MS. WALSH: He said a statement was  
22 read to him.

23 BY MS. BOUCHARD:

24 Q. A statement was read to you?

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1 A. Yes.

2 Q. What was that?

3 A. Should I answer this?

4 MS. WALSH: Off the record for a  
5 second.

6 (Whereupon, a discussion was held  
7 off the record.)

8 BY MS. BOUCHARD:

9 Q. Are you aware that Naseer felt threatened by  
10 you?

11 MS. WALSH: Objection to the form.

12 THE WITNESS: Apparently, that's  
13 what he was saying. I recently became aware of  
14 it.

15 I became aware of it yesterday based on  
16 an e-mail that was read to me.

17 BY MS. BOUCHARD:

18 Q. Are you aware that Naseer was threatened by  
19 you because you said that God was talking to you at  
20 work?

21 MS. WALSH: Objection to the form.

22 THE WITNESS: I'm aware that Naseer  
23 was a liar, right, is really what I'm aware of.

24 I'm aware that I approached Naseer,

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1 right, and he turned around and pretty much took  
2 the entire situation out of context, right, and  
3 created a pack of lies, right, regarding what had  
4 actually occurred.

5 What had actually occurred was that  
6 Naseer was on a basketball alias {sic}, right,  
7 and he supposedly hurt his foot, and he's out of  
8 work for -- essentially, he can't install servers  
9 for like six months, right.

10 Again, this is increasing my workload  
11 going back to the issue that I had with him, and  
12 I've always had with him, right. This is  
13 increasing my workload.

14 We're on the same basketball alias {sic},  
15 and they're sending out e-mails, oh, yeah, we're  
16 going to go play basketball at five o'clock. And  
17 Naseer is responding with, yeah, I'll be there.

18 Then I go to catch the shuttle that's by  
19 the gym, and I see Naseer walking into the gym,  
20 right, and pretty much working out while  
21 supposedly he's too hurt to perform his regular  
22 job functions, right.

23 So I print up the e-mail the next day.  
24 And I go up to him again as a professional

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1           courtesy, as a coworker, right, not to put him  
2           out there and get him fired by our managers,  
3           right.

4                   And I go up to his desk and I give him  
5           the e-mail. And he looks at it. And he's on his  
6           cell phone. And he brushes me off.

7                   And I'm like, you know, like we're on  
8           company time. Shouldn't you get off the phone  
9           and like have this conversation with me, right?

10                   And he's like, yeah, well, you don't need  
11          to be yelling at me and yada, yada, yada {sic},  
12          and all this stuff, because he's obviously  
13          feeling guilty about the fact that he's been  
14          caught in his web of lies, right, and that I can  
15          obviously see through him, right.

16                   I had a conversation with him as a  
17          friend. I think the statement he made was out of  
18          context, right, really.

19                   We had a conversation about spirituality  
20          while we were working. I didn't realize that he  
21          was going to take it out of context.

22                   And I don't think it clearly indicates  
23          anything that occurred between me and him.

24   BY MS. BOUCHARD:

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1 Q. How did you --

2 A. And I don't even see how it's relevant, to be  
3 quite honest, right, to the central theme here, right,  
4 which is really Citigroup being in the practice, right,  
5 of compensating hourly employees, right, people who are  
6 performing network support actions, right.

7 People who are performing network support  
8 within Citigroup, right, are being compensated on a  
9 salary basis, right.

10 This basically gives Citigroup the  
11 opportunity to turn around and work -- I don't know --  
12 50 employees, right, 100 employees, 10,000 employees --  
13 the 10,000 employees that run the IT support department  
14 for Citigroup, right.

15 It gives Citigroup the opportunity, right, to  
16 turn around and work those 10,000 salaried employees,  
17 right, 60 hours a week, right, because they're not  
18 paying time and a half for those additional 20 hours,  
19 right.

20 They can do it indefinitely because they're  
21 not paying time and a half for the additional 20 hours  
22 that it's taking for these people to perform their  
23 day-to-day job responsibilities, right.

24 Whereas, really, if they were being

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1 compensated on an hourly basis, right, Citigroup would  
2 reconsider paying time and a half for those additional  
3 20 hours for all 10,000 employees, right, because it  
4 would be cheaper for them to hire on full-time salaried  
5 -- full-time hourly employees, right.

6 Q. I understand your claims, and thank you for  
7 the speech.

8 But what I'm wondering is whether you  
9 referenced God in a conversation that you had with  
10 Naseer, and if you --

11 A. I don't recall.

12 MS. WALSH: Hold on. Let her  
13 finish the question.

14 BY MS. BOUCHARD:

15 Q. -- if you could explain how that was taken  
16 out of context?

17 MS. WALSH: I'm just going to  
18 object to the question on the grounds of  
19 relevance.

20 THE WITNESS: Again, I don't  
21 understand. I wasn't aware of the communication  
22 up until yesterday when the e-mail was read to  
23 me, and I have no clue in what context he's  
24 stating it.



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1           It might have had a conversation with  
2           him, right, that I was going through a lot of  
3           things in my life, right.

4           I might have had conversations with him  
5           about spirituality in general just in our working  
6           environment while we were working together,  
7           right, but it was in no way, shape, or form  
8           anything like what he made it out to seem,  
9           really.

10          And I don't understand what he gets  
11          off -- really, to be quite honest with you, I  
12          think Naseer felt -- Naseer was constantly trying  
13          to get over on our job responsibilities. He was  
14          constantly trying to get over on people.

15          He was very deceiving. He would tell  
16          people that he was going to deliver certain  
17          things, and then not deliver them.

18          I mean, you could probably look at his  
19          job reviews and his e-mails and his work ethic  
20          and you can end up telling the difference, right.

21          You can look at e-mail trails that took  
22          place between me and him, right, and we could  
23          bring those into the realm of this conversation,  
24          right, if you want to truly discover what was

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1 going on between me and Naseer, right, and you  
2 might get a better understanding of what it was.

3 So really, I don't recall where he got  
4 that from, to be quite honest.

5 BY MS. BOUCHARD:

6 Q. You were telling him that you were having  
7 some problems in your life.

8 Were you seeing a counselor at the time?

9 MS. WALSH: Objection to the  
10 relevance.

11 THE WITNESS: Yeah, again, I don't  
12 see the relevance of this line of questioning.

13 Towards the end of my career at  
14 Citigroup, yeah, I did. I was stressed out  
15 because I was overworked. I had 400 people.

16 I was -- something that I was promised,  
17 right, never materialized, right.

18 BY MS. BOUCHARD:

19 Q. What was the 400 people you were referring  
20 to?

21 A. The 400 engineers that I was supporting from  
22 in the lab facility, right, to help them get their  
23 testing done, right.

24 Q. When did you start seeing a counselor?

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1 A. I went to see her once. Once or twice. And  
2 I don't recall the date. It was towards the end of my  
3 career.

4 I mean, really when -- around the time when  
5 they brought in the additional help, Naseer was  
6 obviously not helping with the situation, right.

7 The fact that this was going to be an ongoing  
8 thing, you know, I had other responsibilities outside  
9 of Citigroup and other things going on in my life,  
10 right, as far as --

11 **Q. What were the other responsibilities outside**  
12 **of Citigroup?**

13 A. I had recently got a divorce, right. And I  
14 needed to obviously maintain my child support payments  
15 which were rather high, right.

16 And I was trying to figure out how I was  
17 going to get out of this bad situation I was in at  
18 Citigroup, right, and still manage to, you know, put  
19 food on my daughter's plate, essentially.

20 That was the whole issue.

21 MS. WALSH: Can we take a break?

22 MS. BOUCHARD: Sure. That's fine.

23 (Whereupon, a recess was taken at  
24 this time.)

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1 (Whereupon, a discussion was held  
2 off the record.)

3 BY MS. BOUCHARD:

4 Q. Mr. Millan, you had said that you had high  
5 child support payments?

6 A. Yes.

7 Q. When you resigned, did those get changed?

8 MS. WALSH: I'm going to object to  
9 the relevance of this line of questioning.

10 You can go ahead and answer.

11 THE WITNESS: No.

12 BY MS. BOUCHARD:

13 Q. Did you go on unemployment after you quit?

14 A. Yeah.

15 Q. Did you receive it?

16 A. Yeah.

17 Q. Looking at your resume, let me ask you this:

18 I thought you had said that you did not complete your  
19 CCNP.

20 A. No, I didn't.

21 Q. On your resume, it states that you completed  
22 the CCNP.

23 A. Curriculum.

24 Q. The curriculum, okay.

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1                   **So that's the distinction?**

2     A.           Completed the CCNP/A, plus network, plus  
3     security, plus curriculas {sic}, but did not take exams  
4     due to training budget issues at Citigroup.

5     **Q.           So you got through all of the curriculum?**

6     A.           Correct.

7     **Q.           I had shown you a document which was a formal**  
8     **written warning, which was marked as Exhibit 2.**

9                   MS. WALSH: Yes.

10    BY MS. BOUCHARD:

11    **Q.           Were these the types of hours that you were**  
12    **keeping from September through your resignation in**  
13    **March?**

14                   MS. WALSH: Objection to the form  
15                   of the question.

16                   Go ahead.

17                   THE WITNESS: I don't recall.

18    BY MS. BOUCHARD:

19    **Q.           Was this about the time that you felt that**  
20    **you gave up on the job because it was understaffed?**

21    A.           To be quite honest with you, I'm not familiar  
22    with exactly why this was happening, right.

23                   I know in March I ended up leaving, right.

24    This was toward the end.

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1 I don't recall, like, the exact chain of  
2 events, right, but I know that there was -- I don't  
3 recall, to be quite honest with you, completely.

4 I mean, I know that there was issues  
5 surrounding the whole situation, right, but I'm not  
6 going to be able to tell you exactly when this took  
7 place.

8 I mean, it's not 606. I don't recall exactly  
9 what the scenario was and exactly what the situation  
10 was.

11 **Q. When you say, issues around the situation, do**  
12 **you mean the situation regarding your tardiness and**  
13 **leaving early?**

14 **A.** No. Actually, probably the main issue around  
15 my tardiness and leaving early, that was -- it might  
16 have been construction on 78 at the time, but I can't  
17 even say that this is accurate, right.

18 **Q. Did you ever tell them that it wasn't**  
19 **accurate?**

20 **A.** At that point, like, you promised me a  
21 position, you --

22 **Q. I'm asking you the question if whether you**  
23 **ever raised with them that you thought that this memo**  
24 **was inaccurate?**

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1 A. No, I didn't deem it necessary.

2 Q. Have you worked for any employer other than  
3 yourself, since your employment ended at Citigroup?

4 A. No.

5 (Whereupon, a discussion was held  
6 off the record.)

7 (Whereupon, Exhibit Millan-5 was  
8 marked for identification.)

9 BY MS. BOUCHARD:

10 Q. Mr. Millan, what's been marked as Exhibit 5  
11 is a Performance Review of you from date period  
12 January 1st, 2003, through December 31st, 2003.

13 I'd like you to read it, and then I'm going  
14 to ask you some questions on it.

15 A. Okay.

16 Q. Have you read it?

17 A. Yes, I have.

18 Q. The reviewer on this is Tom Saranello; is  
19 that correct?

20 A. Correct.

21 Q. How was he as a manager?

22 MS. WALSH: Objection to the form.

23 In what respect?

24 BY MS. BOUCHARD:

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1 Q. Did you like him as a manager?

2 A. Tom is a good manager.

3 Q. When you worked for him, he gave you a pretty  
4 big pay bump, didn't he?

5 A. Yeah.

6 Q. It was about 18 percent?

7 A. Yeah.

8 Q. Did he tell you why he was giving you that?

9 A. Not particularly. I mean, it was a review.

10 Q. Pretty good review, isn't it?

11 A. Yeah.

12 Q. Let's turn to the second to the last page.

13 The overall performance summary.

14 Did you read that?

15 A. Yeah.

16 Q. Is that an accurate statement of your  
17 performance for 2003?

18 A. From what standpoint?

19 Q. Did you feel he was accurately describing  
20 your performance in 2003?

21 A. Not completely. I mean, there's stuff that's  
22 not included there. That's probably what he chose to  
23 highlight, right.

24 Q. That's what he chose to highlight; is that



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1 correct?

2 A. Within the context of what we were trying to  
3 do at the time, yeah -- I mean, which I should probably  
4 elaborate on, right.

5 Citigroup was --

6 Q. There's not a question pending.

7 A. Okay.

8 Q. Did you ever work as a help desk person at  
9 Citigroup?

10 A. We --

11 Q. It's a yes or no question.

12 MS. WALSH: Can you answer it yes  
13 or no?

14 THE WITNESS: No, I can't.

15 BY MS. BOUCHARD:

16 Q. Were you ever on the help desk?

17 A. We would receive direct calls from clients.  
18 So we had a hotline. People knew the hotline. They  
19 might call us directly to just avoid the help desk.

20 Q. Was the help desk the first point of contact?

21 A. Not always.

22 Q. I'm not saying practically, but was there a  
23 group of help desk personnel that was designed to be  
24 the first point of contact?

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1 MS. WALSH: Are you referring to  
2 when he was a telecommunications analyst, or when  
3 he was at the lab?

4 BY MS. BOUCHARD:

5 Q. In 2001.

6 A. I mean, the interaction, the way it took  
7 place, right, was sometimes people would call the help  
8 desk, sometimes people would call the system  
9 administrators, and sometimes people would call us.

10 We all had, essentially, hotlines, right,  
11 that ran to the entire group. So I don't understand  
12 what the nature of your question is like.

13 Q. My question is, did you know of people that  
14 worked there in 2001, that were help desk personnel?

15 A. I knew that we had a help desk, yeah.

16 Q. Do you know approximately how many people sat  
17 at that help desk?

18 A. No.

19 Q. What's your estimate?

20 A. I have no estimate. I don't know how many  
21 people sat there.

22 Q. I believe your previous testimony, correct me  
23 if I'm wrong, is that once a call came into the help  
24 desk, you would get a trouble ticket from them?

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1 A. The scenario could have taken place in the --

2 Q. I'm asking in the situation where help desk  
3 got the call first.

4 A. Could you clarify on the question, because  
5 I'm not understanding what it is, what you're trying to  
6 get.

7 Q. If a Citigroup employee or CTI employee had  
8 trouble and they called the help desk --

9 A. Yeah.

10 Q. -- then how would the help desk contact you?  
11 What would be the mechanism?

12 A. Depending on the nature of the issue, they  
13 would put in a trouble ticket, I guess. It was a  
14 trouble ticketing system.

15 Q. A trouble ticket?

16 A. Yeah.

17 Q. How would your group determine who would  
18 handle the trouble ticket?

19 MS. WALSH: At what point in time  
20 are we talking about?

21 MS. BOUCHARD: 2001.

22 THE WITNESS: 2005?

23 BY MS. BOUCHARD:

24 Q. 2001.

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1 MS. WALSH: 2001.

2 THE WITNESS: Oh, 2001. We were  
3 responsible for different areas of the building.  
4 But, I mean, essentially whoever got to the  
5 ticket first did it, whoever was available.

6 Because we had customer service requests  
7 and trouble tickets, right. So if someone is --  
8 if everybody is working on the trouble tickets --  
9 I mean on the customer service requests and a  
10 trouble ticket comes in, whoever was available  
11 would handle it.

12 BY MS. BOUCHARD:

13 **Q. What types of trouble tickets would you get?**  
14 **What are typical scenarios?**

15 MS. WALSH: Again, this is all  
16 relating back to 2001?

17 MS. BOUCHARD: Yes.

18 THE WITNESS: Network support  
19 tickets. Typically people -- we would go and  
20 test the person's connection at their desk  
21 location and find out what network they were on.

22 Make sure the connection was working  
23 properly.

24 BY MS. BOUCHARD:

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1 Q. Now, I'm going to go back to 2003.

2 MS. WALSH: Exhibit 5?

3 MS. BOUCHARD: Exhibit 5.

4 BY MS. BOUCHARD:

5 Q. In the overall performance summary, it talks  
6 about the 388 lab build-out.

7 What was the lab build-out?

8 A. I don't recall specifically what project it  
9 was, but we had three types of work, right, when we  
10 were in this group.

11 Essentially, we would have projects where  
12 they would need network connectivity -- well,  
13 actually -- I'm sorry.

14 This has got to be the 388 Greenwich lab.

15 Q. When you say there were three main tasks in  
16 this group, do you mean as a network analyst?

17 A. No. That was the title. I mean, that was  
18 the job function.

19 Ultimately, we were responsible for network  
20 support, right.

21 Q. What I'm asking is, from the time you were  
22 employed from 2001 to 2003, are you talking about three  
23 main tasks that you had during that period?

24 A. Yeah.

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1 Q. Okay. Go ahead.

2 What were those three main tasks?

3 A. All right. Essentially, we would receive  
4 trouble tickets. We work on customer service requests  
5 that were also on the system.

6 And then beyond that, we would have things  
7 that would come up similar to this like 388 lab if they  
8 were remodeling a floor or something.

9 At which case Tommy, our team lead, would  
10 meet with the appropriate personnel, right. Depending  
11 on where it was located in the building, he would hand  
12 it off to a technician. And the technician would  
13 assist in the cabling of that particular floor, right.

14 So the lab build-out was essentially like  
15 providing X amount of network connections and making --  
16 testing them and making sure that they're on the  
17 network for the lab to work.

18 Q. Now, why couldn't an electrician just do  
19 that?

20 A. Because the cable plant for the building,  
21 right, the cabling for the building, there was specific  
22 components that if you disconnected a cable on the  
23 seventh floor, right, the 35th floor might get  
24 disconnected.

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1 And we support a network connectivity for the  
2 entire building, right. So since we support a network  
3 connectivity for the entire building, we were expected  
4 to document it.

5 So if we had an electrician in there and he  
6 didn't know where a cable was or he cut something or he  
7 wasn't familiar with something, right, or he installed  
8 something and didn't document it properly, now when it  
9 comes back -- when it comes time to troubleshoot a  
10 network connectivity issue, right, you can't do it  
11 efficiently because you don't have the documentation,  
12 right.

13 So it was deemed that central groups would  
14 handle network support from a cabling perspective for  
15 entire sites, right. And that's pretty much what we  
16 did.

17 **Q. Now, I think you said that there was a third**  
18 **core function?**

19 **A.** I just mentioned all three.

20 **Q. Did you?**

21 **A.** Yeah.

22 **Q. So it was the trouble ticketing, the lab**  
23 **build-out, and -- I'm sorry, I missed the third.**

24 **What was the third one again?**

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1 MS. WALSH: Customer service.

2 THE WITNESS: Customer service,  
3 plus trouble ticketing, and like projects that  
4 might not necessarily fall within the scope --  
5 the customer service request system in Citigroup  
6 didn't necessarily -- it was like down to like  
7 one user.

8 So if you needed a couple of hundred  
9 connections installed on a given floor, like they  
10 might submit a blanket CSR.

11 Like, there was really not necessarily a  
12 work flow around it. Tommy would deal with those  
13 type of requests. And then he would delegate  
14 them appropriately.

15 BY MS. BOUCHARD:

16 Q. Is that a restack, or is that something  
17 different?

18 A. A restack would have been considered a  
19 project as well.

20 Q. Why was your knowledge of networking a help  
21 in this group?

22 MS. WALSH: Objection to the form  
23 of the question.

24 THE WITNESS: Why was my knowledge



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1 of networking --

2 MS. WALSH: Which group are you  
3 referring to?

4 MS. BOUCHARD: Well, I'm still on  
5 the 2003 review.

6 MS. WALSH: Okay.

7 BY MS. BOUCHARD:

8 **Q. At least Tom, your manager, thought that your**  
9 **knowledge of networking and initiative to address all**  
10 **compliance issues was a major part of the success.**

11 A. It might have been a help from the standpoint  
12 that -- I mean, really I can't tell you particularly  
13 what he meant by that statement, right, but we did have  
14 to, like, set port speeds on switches and stuff and  
15 turn up the ports after we connected them, right. And  
16 you had to be familiar with Cisco IOS. And I had a  
17 CCNA certification, right.

18 So as it pertained to Cisco IOS, I pretty  
19 much knew the commands, right, that you needed. There  
20 was like probably three or four commands that you  
21 needed to know to be able to troubleshoot a device  
22 properly there from a connectivity standpoint.

23 So that's why I'm assuming he could have  
24 wrote that.